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VIA FACSIMILE

The Honorable Sidney H. Stein Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Room 1010 New York, New York 10007

Re:

Ceesay v. Document Technologies, Inc.

07 Civ. 11268 (SHS) (KNF)

Dear Judge Stein:

MEMO ENDORSED

We represent Plaintiff Oumie Ceesay in the above-referenced matter, and write on behalf of both parties requesting an order granting a 90-day extension of the discovery deadline, which is currently set for August 29, 2008. This is the parties' first request for an extension of the discovery deadline.

The parties make this request as good faith delays in the parties' document productions have prolonged the discovery process. The final round of both parties' production occurred this week. The parties were not able to schedule depositions prior to the completion of production, so depositions have not taken place yet.

At this time, Plaintiff and Defendant each states that all responsive documents in their possession have been produced to the other. Counsel for the parties have conferred on several occasions regarding the scheduling of Plaintiff's deposition in September or possibly earlier, and are working cooperatively toward moving discovery forward.

As a result, we respectfully request that the original discovery deadline of August 29, 2008 as set forth in your honor's June 27 order, be extended to November 26, 2008. Coursel for Last day be discovery is extended to October 17 Defendant joins in this request. senains at Sept 12 at 1/4M. SO ORDERED 8/18/0

Respectfully submitted,

SIDNEY N. STEIN

U.S.D.J.

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